Owens, Mike

From: Worstell, Aaron
Sent: Thursday, May 15, 2014 11:36 AM
To: Eric Olsen
Cc: Dave Crabtree; Rothery, Deirdre; Owens, Mike; Laumann, Sara
Subject: Heat input capacity

Hi Eric-

During yesterday's conference call to discuss the 114 information request, Deseret requested clarification regarding item 1.C of the request which asks for "[t]he maximum hourly heat input capacity of the Unit 1 boiler between 1995 and 2014." The purpose of this email is to provide further clarification on that item.

What we are seeking under item 1.C. is the maximum heat input capacity as desribed in the Title V Statement of Basis as "the ability of a steam generating unit to combust a stated maximum amount of fuel on a steady state basis, as determined by the physical design and characteristics of the steam generating unit."

In the Statement of Basis for the draft Title V permit, referencing Utah's 1998 Modified Source Plan Review (MSPR), EPA states the following:

> According to the MSPR's description of the ruggedized rotor project, "[b]ecause of the increased capacity of the Turbine Generator to handle steam flow, there will be a net increase in certain emissions resulting from an overall increase in the heat input to the boiler from 4381 MMBtu's/Hr to 4578 MMBtu's/Hr."

However, also as noted in the Statement of Basis, both the actual pre-project and post-project data (obtained from EPA's Air Markets Program Data [AMPD]) show that the heat input values given in the MSPR were substantially exceeded and do not appear to be an accurate representation of actual as-fired heat input capacity or operations at the plant. Therefore, in response to item 1.C. of the information request, please report the higher of 1) the design heat input capacity of the unit, or 2) the actual as-fired heat input capacity.

In addition, though we request the *hourly* heat input capacity in our information request, please report the heat input capacity that can be sustained on a steady-state basis.

Finally, if the as-fired heat input capacity is higher than the design heat input capacity, and there is some question as whether to report the CEM-based heat input capacity or that calculated from coal use and characteristics, please use your judgment as to which is more accurate.

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What is wanted is not the will to believe, but the wish to find out, which is the exact opposite. -Bertrand Russell